

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Case No. 2:22-mj-30275

Plaintiff,

v.

Demario Ridley,

Defendant.

AGREED STIPULATION FOR PROTECTIVE ORDER

The United States of America, by and through Dawn N. Ison, United States Attorney for the Eastern District of Michigan, Trevor Broad and Ranya Elzein, Assistant United States Attorneys, Defendant Demario Ridley and his attorney, Sanford Plotkin, file this stipulation for entry of a Protective Order.

Defendant is charged via Complaint with Wire Fraud, Mail Fraud, and Aggravated Identity Theft. The investigation of Defendant involves the collection of evidence of the theft and use of victims' personal identifying information. The government intends to produce some of this evidence pre-indictment. This evidence is hereinafter referred to as "discovery materials."

In order to protect the privacy of the individuals whose personal identifying information is included in the discovery materials, the parties stipulate to the issuance of a protective providing the following conditions regarding the disclosure of the discovery materials:

- a) Access to the discovery materials shall be restricted to persons authorized by this stipulation and protective order, namely, Defendant, Defendant's attorneys of record in this case, and any employees of the attorneys of record who are performing work on behalf of Defendant, to include any defense investigators;
- b) Defendant may review such materials in the presence of his defense counsel or other employees assisting in defense preparation; however, Defendant shall not be permitted to keep such materials, including copies and notes of such materials;
- c) Defense counsel and Defendant shall not disclose, make copies of, or reveal the contents of such materials to any other persons not authorized to receive the discovery materials under this stipulation and protective order without prior written consent of the government or further order of the Court; and
- d) Any and all discovery materials received by defense counsel and Defendant, and copies of such materials, shall be returned to the government at the conclusion of these proceedings. Defense counsel may retain any notes made by Defendant, the defense, and experts under the conditions provided above, or shall destroy them.

Any discovery material that is filed with the Court in connection with proceedings in this case shall be filed under seal and shall remain sealed until

otherwise ordered by this Court. This does not entitle either party to seal their filings as a matter of course. The parties are required to comply in all respects to the relevant local and federal rules of criminal procedure pertaining to the sealing of court documents.

IT IS SO STIPULATED.

s/Ranya Elzein

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/s/ Sanford Plotkin (with consent)

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Date: January 19, 2023

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United States of America,

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Defendant.

PROTECTIVE ORDER

The parties have stipulated to a protective order limiting the disclosure of discovery materials, namely the evidence of theft and use of personal identifying information, and the court being fully apprised of the basis for the stipulation and finding good and sufficient cause in support thereof:

IT IS HEREBY ORDERED that the disclosure of the discovery materials defined in the parties' stipulation is governed by the following conditions:

- e) Access to the discovery materials shall be restricted to persons authorized by this stipulation and protective order, namely, Defendant, Defendant's attorneys of record in this case, and any employees of the attorneys of record who are performing work on behalf of Defendant, to include any defense investigators;
- f) Defendant may review such materials in the presence of his defense counsel or other employees assisting in defense preparation; however,

Defendant shall not be permitted to keep such materials, including copies and notes of such materials;

- g) Defense counsel and Defendant shall not disclose, make copies of, or reveal the contents of such materials to any other persons not authorized to receive the discovery materials under this stipulation and protective order without prior written consent of the government or further order of the Court; and
- h) Any and all discovery materials received by defense counsel and Defendant, and copies of such materials, shall be returned to the government at the conclusion of these proceedings. Defense counsel may retain any notes made by Defendant, the defense, and experts under the conditions provided above, or shall destroy them.

IT IS FURTHER ORDERED that any discovery material that is filed with the Court in connection with proceedings in this case shall be filed under seal and shall remain sealed until otherwise ordered by this Court. This does not entitle either party to seal their filings as a matter of course. The parties are required to comply in all respects to the relevant local and federal rules of criminal procedure pertaining to the sealing of court documents.

IT IS SO ORDERED.

s/David R. Grand
David R. Grand
United States Magistrate Judge

DATED: 1/23/23